

WISPs need unlicensed use of the 3.6 GHz band to provide adequate wireless broadband to both urban and rural customers. We request that the frequencies discussed in this NPRM made available for outdoor use only by wireless broadband providers.

- * Indoor wireless signals from consumer equipment used in residences and businesses are raising the noise floor on existing Part 15 bands, rendering them useless for "last mile" broadband;

- * Customers often unknowingly operate indoor and outdoor equipment on the same frequencies, causing self-interference;

- * Current EIRP limitations in the 900 MHz, 2.4 GHz, and 5.8 GHz bands limit the range of wireless broadband access points, making them uneconomical to deploy in sparsely populated areas;

- * There is already precedent for limiting frequencies to indoor use in the current Part 15 regulations; it is equally appropriate to limit frequencies to outdoor use to prevent interference;

- * No one has claimed -- in this proceeding or elsewhere -- that there is a shortage of spectrum for consumer devices that are typically used indoors;

- * If the FCC is to claim that wireless broadband represents effective intermodal competition for DSL and cable modem service, more spectrum and greater operating ranges are required